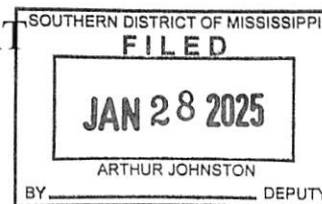


## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

Northern Division

JERIN B. WRIGHT

Case No.

3:25-cv-67-HTW-LGI

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

STATE OF MISSISSIPPI  
MADISON COUNTY SHERIFF OFFICE  
WILLIAM HORTON  
PAMEL L. HANCOCK

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☐ Yes ☒ No

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	JERIN B WRIGHT		
Address	2371 SWEETLEAF STREET		
	BATON ROUGE	LA	70816
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	(225) 239-3361		
E-Mail Address	wrightj525@gmail.com		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	STATE OF MISSISSIPPI		
Job or Title <i>(if known)</i>			
Address			
		MS	
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

**Defendant No. 2**

Name	MADISON COUNTY SHERIFF OFFICE		
Job or Title <i>(if known)</i>			
Address	2941 U.S. HIGHWAY 51		
	CANTON	MS	39046
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	(601) 859-2345		
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

## Defendant No. 3

Name WILLIAM HORTORN

Job or Title (if known)

Address

2941 U.S. HIGHWAY 51

CANTON

MS

39046

City

State

Zip Code

County

MADISON

Telephone Number

(601) 859-2345

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

## Defendant No. 4

Name PAMELA L. HANCOCK

Job or Title (if known)

MADISON COUNTY ATTORNEY

Address

2961 SOUTH LIBERTY STREET

CANTON

MS

39046

City

State

Zip Code

County

MADISON

Telephone Number

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?  
CONSTITUTION OF THE UNITED STATES — ARTICLE IV (4), V (5) AND XIV (14)

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- WILLIAM HORTON, employed at Madison County Sheriff Offices with permission from the state of MISSISSPPI. Assaulted, Tased multiple times, confiscated personal property, held at gun point with deadly intent, kidnapped and imprisoned from 4/29/23 thru 5/2/23. Threatened with 1yr criminal time by PAMELA L. HANCOCK and forced to travel multiple times for court under threat of arrest and imprisonment. Ultimately to have all charges dismissed by the State with prejudice against JERIN BRICE WRIGHT almost a year later on 3/07/2024.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?  
CALHOUN STATION PARKWAY Madison, MS at the gas station.
- B. What date and approximate time did the events giving rise to your claim(s) occur?  
4/29/2023 Approx. 18:24. thru 03/07/2024. JERIN BRICE WRIGHT was dismissed of all charges on 3/07/2024.
- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)  
The facts are JERIN B WRIGHT was deprived life, liberty, and the pursuit of happiness by WILLIAM HORTON by applying commerce regulations to a private citizen to assault confiscate property tase threaten with lethal force and imprison for days without probable cause or due process of law. PAMELA L. HANCOCK along with the State of MISSISSPPI threatened JERIN B WRIGHT with prison time and forced to travel multiple times back to court then finally on 3/07/2024 all Charges are dismissed DUE TO LACK OF COMPLAINING WITNESS. STATE WAS UNABLE TO MOVE FORWARD.

#### **IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I do not have insurance and cannot afford to be evaluated. I have injuries PHYSICAL AND MENTEAL and will have to seek help over time.

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#### **V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

JERIN B WRIGHT is asking the courts to order the DEFENDANTS to compensate JERIN B. WRIGHT for assault, tasing, being held at gun point with deadly intent, bound and imprisonment in the amount of 5,000,000 U.S. dollars. JERIN B. WRIGHT is asking for 250,000 for each day spent in prison at Madison County jail which was four days, totaling 1,000,000 U.S. Dollars. While imprisoned JERIN B WRIGHT was repeatedly asked to give samples of urine by nurses and guards which JERIN B. WRIGHT repeatedly refused. From 05/30/2023 to 03/07/2024 JERIN B. WRIGHT was forced to travel under threat to multiple court hearings. He is asking 1,000,000 for his time. JERIN B WRIGHT did and does not have insurance to seek mental, psychiatric or physical treatment for himself and also Has a 2009 Harley Davison Motorcycle impounded at Wards Wrecker Service to this date. Please release as soon as possible. JERIN B WRIGHT is asking the COURTS to order the defendants to pay a total of 7,000,000 U.S. Dollars for violating Constitutional Rights, Pain, and suffering along with future expenses that must be addressed which will include the mental and physical aspects over time due to the actions of the ALL defendants involved.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

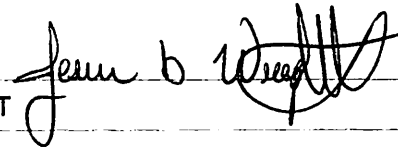
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1-16-2025

Signature of Plaintiff

Printed Name of Plaintiff

JERIN B. WRIGHT

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address